

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Nathan G. Kanute, Esq.
Nevada Bar No. 12413
Jennifer L. McBee, Esq.
Nevada Bar No. 9110
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: asorenson@swlaw.com
nkanute@swlaw.com
jmcbee@swlaw.com

*Attorneys for HSBC Bank USA, N.A., as Trustee for
Wells Fargo Home Equity Asset-Backed Certificates,
Series 2006-3, by its Attorney-in-fact Wells Fargo
Bank, N.A., Wells Fargo Bank, N.A., and Wells
Fargo Asset Securities Corporation*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

Plaintiff,

vs.

HSBC BANK USA, N.A., as trustee for
WELLS FARGO HOME EQUITY
ASSET-BACKED CERTIFICATES, Series
2006-3, by its Attorney-in-fact WELLS
FARGO BANK, N.A.; WELLS FARGO
BANK, N.A.; and WELLS FARGO
ASSET SECURITIES CORPORATION,

Defendants.

Case No.: 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(Second Request)

Pursuant to LR 7-1 and LR 26-4, Plaintiff Edyta Gryglak (“Plaintiff”) and Defendants HSBC Bank USA, N.A., as Trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A. (“HSBC”); Wells Fargo Bank, N.A. (“Wells Fargo”); and Wells Fargo Asset Securities Corporation (“WFASC”, collectively with HSBC and Wells Fargo, “Defendants”) (collectively with Plaintiff, the “Parties”), by and through their counsel, and in light of the Court’s recent ruling on Defendants’ motion to dismiss

1 and counsel for Defendants' medical issues, hereby stipulate and request that this Court extend
2 the remaining discovery deadlines in the above-captioned case by a modest forty-five (45) days.
3 The current close of discovery is March 29, 2018, and the Parties seek an extension to May 14,
4 2018.

5 This is the Parties' Second Request to extend the discovery deadlines. In support of this
6 Stipulation, the Parties state as follows.

7 **A. REASONS WHY REMAINING DISCOVERY WAS NOT COMPLETED**

8 As previously noted to the Court, Defendants' counsel Blakeley E. Griffith, Esq., had
9 taken the lead in litigating this case on behalf of Defendants, but was on leave pursuant to the
10 Family Medical Leave Act ("FMLA") through March 25, 2018. Unfortunately, counsel that took
11 her place as lead, Jennifer L. McBee, Esq., recently had a health diagnosis in February that has
12 required her to have multiple out-of-town doctor appointments and will require surgery shortly.
13 This unexpected medical issue has not allowed Ms. McBee to complete the written discovery
14 requests that she anticipated getting done shortly after the last extension request to this Court. The
15 undersigned has recently stepped in as lead for Defendants until Ms. Griffith returns at the end of
16 March 2018. The undersigned is getting up to speed on this matter and is preparing responses to
17 Plaintiff's written discovery requests.

18 The Parties have agreed that Defendants will respond to Plaintiff's written discovery on or
19 before March 23, 2018 and Plaintiff will respond to Defendants' written discovery on or before
20 April 6, 2018. The Parties will also work together to set deposition dates establish dates for all
21 depositions to take place in April.

22 The Parties have been working diligently to litigate this action, with a dispositive motion
23 having recently been ruled on and written discovery propounded by all Parties. Extending the close
24 of discovery and dispositive motion deadlines will allow additional time for counsel to finalize
25 written discovery responses in advance of depositions that will be scheduled.

26 The Parties do not seek an extension for any improper purpose, or for the purpose of
27 delay. Additionally, an extension of time will not prejudice the Parties, as all counsel explicitly
28 consents to the requested extension. Finally, the Parties are only requesting an extension of the

1 close of discovery, dispositive motions, and the joint pretrial order, and request that these deadlines
2 be extended, as detailed below.

3 **B. DISCOVERY COMPLETED TO DATE**

4 The following discovery has been completed:

- 5 1. Plaintiff served written discovery requests on Defendants on or about December
6 21, 2017.
- 7 2. Defendants served written discovery on Plaintiff on or about January 10, 2018.
- 8 3. The Parties are working to schedule depositions.

9 **C. DISCOVERY THAT REMAINS TO BE COMPLETED**

10 The following discovery remains to be completed:

- 11 1. The Parties must respond to written discovery requests.
- 12 2. The Parties intend to notice all depositions for April 2018.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

D. PROPOSED SCHEDULE

Accordingly, the Parties propose the following schedule:

Event	Current Deadline	Proposed New Deadline
Close of Discovery	March 29, 2018	May 14, 2018
Dispositive Motions	April 28, 2018	June 15, 2018
Joint Pretrial Order	May 28, 2018	July 16, 2018

Dated: March 8, 2018.

SNELL & WILMER L.L.P.

By: /s/ Nathan G. Kanute
Amy F. Sorenson (NV Bar No. 12495)
Nathan G. Kanute (NV Bar No. 12413)
Jennifer L. McBee (NV Bar No. 9110)
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

*Attorneys for HSBC Bank USA, N.A., as Trustee
for Wells Fargo Home Equity Asset-Backed
Certificates, Series 2006-3, by its Attorney-in-fact
Wells Fargo Bank, N.A., Wells Fargo Bank, N.A.,
and Wells Fargo Asset Securities Corporation*

Dated: March 8, 2018.

AVRAMSKI LAW, PC

By: /s/ Boris Avramski
Boris Avramski (NV Bar No. 11350)
602 So. 10th Street
Las Vegas, NV 89101
Telephone: (702) 522-1808
Facsimile: (702) 685-3625

Attorney for Plaintiff

ORDER

IT IS SO ORDERED.

DATED: March 9, 2018


UNITED STATES MAGISTRATE JUDGE